

SIMPSON THACHER & BARTLETT LLP

Sandeep Qusba

William T. Russell, Jr.

425 Lexington Avenue

New York, NY 10017-3954

Telephone: (212) 455-2000

Facsimile: (212) 455-2502

*Counsel to the Official Committee
of Unsecured Creditors of Gawker Media LLC, et al.*

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re:

Gawker Media LLC, *et al.*

Debtors.

Chapter 11

Case No. 16-11700 (SMB)

(Jointly Administered)

Re: Dkt. 309

**RESERVATION OF RIGHTS BY THE OFFICIAL COMMITTEE OF UNSECURED
CREDITORS TO DEBTORS' MOTION FOR THE ENTRY OF AN ORDER
APPROVING (I) THE ADEQUACY OF THE DISCLOSURE STATEMENT, (II) THE
SOLICITATION AND NOTICE PROCEDURES WITH RESPECT TO
CONFIRMATION OF THE JOINT CHAPTER 11 PLAN OF LIQUIDATION FOR
GAWKER MEDIA GROUP, INC., GAWKER MEDIA LLC, AND GAWKER HUNGARY
KFT., (III) THE FORM OF BALLOTS AND NOTICES IN CONNECTION
THEREWITH, AND (IV) THE SCHEDULING OF CERTAIN DATES WITH RESPECT
THERETO [DKT. 309]**

The Official Committee of Unsecured Creditors (the “**Committee**”) has been engaged in a constructive dialogue with the above-captioned debtors and debtors in possession (collectively, the “**Debtors**”)¹ regarding the terms of a settlement of essential plan-related issues, including the allocation of proceeds from the sale of Debtors’ assets to UniModa, LLC. The Committee is hopeful that those discussions will result in a plan and disclosure statement that the Committee will support. The Committee has just received a revised plan of liquidation and is in the process of reviewing it.

In light of ongoing negotiations and the Committee’s interest in achieving efficient resolution of all disputes, the Committee respectfully reserves its rights to object to the disclosure statement and any plan of reorganization if the Debtors and Committee are unable to reach a consensual resolution.

Dated: October 31, 2016
New York, New York

/s/ William T. Russell, Jr.

SIMPSON THACHER & BARTLETT LLP
Sandeep Qusba
William T. Russell, Jr.
425 Lexington Avenue
New York, NY 10017
Tel. (212) 455-2000
Fax (212) 455-2502
squsba@stblaw.com
wrussell@stblaw.com

*Counsel to the Official Committee of
Unsecured Creditors*

¹ Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Disclosure Statement for the Debtors’ Joint Chapter 11 Plan of Liquidation for Gawker Media Group, Inc., Gawker Media LLC, and Gawker Hungary Kft., dated September 30, 2016 [Docket No. 308] (“**Disclosure Statement**”).